

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

VETERANS GUARDIAN, LLC, *et al.*,
Plaintiffs,

v.

MATT PLATKIN, in his official capacity as
Attorney General of New Jersey,
Defendant.

Civil No.

DECLARATION OF ANDRE JESUS SOTO

I, Andre Jesus Soto, declare:

1. I am a retired Sergeant of the U.S. Army living in Somerville, New Jersey.
2. During my Army career between 2005 and 2015, my tours included Iraq and Afghanistan.

In Iraq, I worked as a gunner and a driver on 380 security missions, including escorts through Baghdad, and delivery missions. I also drove the head truck on recovery missions (picking up destroyed tanks and vehicles) and helped build multiple infantry compounds. In Afghanistan, I managed security for the generals' compound, including escorting the local population, conducting searches at the entry point, and controlling the entry point. Back home, I was stationed at Fort Riley, Kansas and Fort Campbell, Kentucky. My honors include two Army Achievement Medals, two Army Commendation Medals, three Army Good Conduct Medals, a Global War on Terrorism Service Medal, an Iraq Campaign Medal with a Campaign Star, and an Afghanistan Campaign Medal with two Campaign Stars.

3. I suffer from multiple conditions as a result of my military service, including post-traumatic stress disorder ("PTSD"), pain in my joints, and hearing loss. I therefore qualify for disability benefits from the Department of Veterans Affairs ("VA").

4. However, I was unsuccessful in seeking disability benefits from the VA on my own. After I left the military, I tried to work with the VA to begin receiving disability benefits, but I found the process difficult and was not able to accomplish anything. I received no disability compensation until 2019, when I turned to private organizations for help.

5. In 2019, my brother-in-law, who had also served in the Army, directed me to a private company that he said could help me restart the process of seeking disability benefits. I was reluctant at first because of my disheartening prior experience with the VA, but I decided to give it a try and finally received disability benefits for the first time since I had been discharged from the Army.

6. However, the VA did not approve all of my conditions as service-connected. My brother-in-law recommended that I contact Veterans Guardian ("VG").

7. I contacted VG in early 2022, and they were able to help me. VG guided me through the process of applying for an increased disability rating based on my PTSD, including gathering the right medical documentation and other paperwork. I submitted the application VG helped me prepare and was approved for the higher disability rating and benefits increase.

8. I was very pleased with VG's help and recommended VG's services to other veterans.

9. This summer, I began working with VG on claims for my additional service-connected conditions that the VA has not approved. But a month into the process, VG informed me that NJ passed SB 3292, which prevents VG from assisting me with my disability benefits claim for compensation. I had not known of S3292 until VG told me of it and told me that, while they would still help me with some minimal aspects of my claim, they would not be able to provide their full services because of the law.

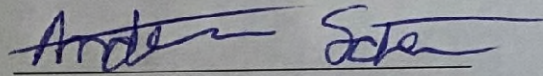
10. I understand that VG charges a fee for its services if a claim is successful in increasing the veteran's disability rating, and I think the fee of five times the amount of monthly increase is fair. I also know that there are free alternatives to VG.

11. I want to continue working with VG on my claim for an increased disability rating, and I do not know what I will do if SB 3292 stands. VG did a good job of helping me try to get results from VA, giving me a lot of guidance on how to pursue an increased rating and the paperwork needed, and

guiding me through the process. The VA did not help me with any of that. Based on my previous experience with the VA, I do not believe that I can receive the full disability benefits to which I am entitled working directly with the VA. While I have used veterans service organizations for help with veterans' services other than disability benefits, I do not believe that they have the expertise to provide the services that VG has provided me.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 18 day of September, 2023 in Somerville, New Jersey.

A handwritten signature in dark ink, appearing to read "Andre Soto", written over a horizontal line.

Andre Jesus Soto